

Privacy Agreement and Consent

The Personal Information Protection and Electronic Documents Act (“PIPEDA”) and the Protection of Personal Information (“PII”, “Law 25”, formerly known as Bill 64) sets out the rules for the collection, management, use and disclosure of personal information. It is supposed to balance an individual’s right to the privacy of personal information with the need of organizations to collect, use or disclose personal information for legitimate business purposes. Financial companies choose how they share your personal information. Federal law also requires us to tell you how we collect, share and protect your personal information. This policy applies for as long as we hold your information, including after the end of our business with you. Please read this notice carefully to understand what we do.

Client Privacy Is Friedberg’s Priority

Friedberg Mercantile Group Ltd. (“FMGL”) is committed to safeguarding the personal information that our customers provide to us. This private policy describes how FMGL handles and protects personal information we collect about individuals who apply for or receive FMGL services. The provisions of this policy apply to former customers as well as current customers.

What Does Friedberg Mercantile Group Ltd. Do With Your Personal Information

When you submit the New Customer Application Forms and/or a Subscription Application for any of FMGL’s investment funds, we collect personal information about you for business purposes, such as processing your application, processing your requests and transactions. Thereafter we maintain an account with FMGL informing you about new products and services that may be of interest to you, and providing customer service. The need to collect the information is required by the self-regulatory organizations that oversee our industry. The personal information we collect about you includes:

- information you provide to us on subscription documents, applications and other forms, such as your name, address, bank account, date of birth, social insurance number/social security number (required for tax purposes, especially if an account generates income), occupation, assets and income
- account statements and other information about your transactions with us
- information we receive from consumer reporting agencies, such as your credit history and creditworthiness
- information you provide to us to verify your identity, such as your driver’s license or passport and signature
- information received from Canadian/US or foreign governments or other entities not affiliated with us
- recorded conversations with brokers
- knowledge and goals for investments and financial planning, risk tolerance and investment horizon

How We Use and Share Your Information

We use and share your information to:

- verify your identity, update your information and verify the accuracy of the information you provide
- assess your financial situation and creditworthiness
- assess your eligibility for products and services or ensure that the advice, products and services we offer or you obtain are suitable for you
- establish your investor profile, your financial needs and objectives as well as your investment strategies
- prevent, detect and control fraud, as well as any unauthorized or illegal activities (money laundering, cyber threats, etc.)
- communicate with you using the contact information you provided (by mail, email, text messages, phone calls)

How We Protect Personal Information

We limit access to your personal information to those FMGL employees who need to know it in order to comply with regulatory requirements, service your account, and help you accomplish your financial objectives, by providing you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so, including yearly risk and vulnerability assessments and privacy impact assessments (“PIA”), related to acquisition, development and redesign of information systems or electronic delivery project involving personal information. We maintain physical, electronic and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone. We protect our servers via strong firewalls; brokers and all personnel use 2 step verification access to their computers to safeguard your privacy. We constantly update our antivirus and spam filters for cyber security threats. We conduct ongoing privacy and cyber security training and awareness activities. Periodically we revise the privacy program in light of changes in laws, regulatory or company policy.

Any breach of security safeguards that can cause significant harm to your private information will be reported to you and the Privacy Commissioner of Canada, and if you are a Quebec resident, based on Quebec’s Law 25, we will notify the Commission d’accès à l’information (CAI) and affected individual when a prescribed breach occurs.

We will keep records of breaches of security that affect your personal information for at least two years. Information that is not needed for the purpose of doing business with FMGL is destroyed/deleted.

Sharing Information With Affiliates

We may share personal information described above with our affiliates for business purposes, such as, but not limited to servicing client accounts and informing clients about new products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law. Our affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company. Most of these companies are outside of Quebec. The information we share with affiliates may include any of the information described above, such as your name, address, trading and account information. Our affiliates maintain the privacy of your information to the same extent FMGL does in accordance with this policy.

Disclosure to Non-Affiliated Third Parties

In order to support the financial products and services we provide to you, we may share the personal information described above with third-party service providers, including financial service institutions (e.g., dealers, brokers and banks), auditors, lawyers and the companies under contract to perform services for us or on our behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and services. These companies acting on our behalf are required to keep your personal information confidential. Except as described in this privacy policy, we will not use your personal information for any purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so. We want you to know that FMGL will not sell your personal information.

Accessing and Revisiting Your Personal Information

We endeavor to keep our customer files complete and accurate. We will give you reasonable access to the information we have about you. Most of the information is contained in account documentation that you submit to obtain our services and statements that you receive from us. We encourage you to review this information and notify us, in writing, if you believe any information should be corrected or updated. If you have any questions or concerns about your personal information or this privacy notice, please contact your investment adviser or Enrique (Rick) Zauderer, FMGL's Chief Privacy Information Officer/PCPI.

Retention of Personal Information

FMGL may retain your personal information on file after you cease to be a client, for as long as FMGL requires such information or as long as is demanded by our regulatory requirements. We will provide you, upon request, with your personal information that we hold.

When your information is no longer needed, we use reasonable efforts to securely destroy it.

Consent

By opening an account with us, you are providing your consent for us to collect, use and release your personal information.

You are not required to supply any of the personal information that we may request, but failure to do so may result in our being unable to open or maintain your account or provide services to you. Further, while we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information. Personal information can be communicated outside of Quebec, for those applicable clients. If you do not wish to have your personal information disclosed to our affiliates or other third parties as described in this policy, please contact us via e-mail at privacy@friedberg.ca or send your request to:

Chief Privacy Information Officer
Friedberg Mercantile Group Ltd.
220 Bay Street, Suite 600
Toronto, Ontario M5J 2W4

If at any time you wish to withdraw this consent, please advise us. However, please note that withdrawing consent may mean that we will be unable to provide certain services to you. We will explain the consequences of withdrawing consent, should you choose to do so.